

Exhibit B

Exhibit B

'086 Patent, claim 18

Claim Element	Allegations in the First Amended Complaint	Alleged Actors in the First Amended Complaint
18. An apparatus, comprising:	<p><u>Paragraph 68-72 of the First Amended First Amended Complaint</u></p> <p>68. As described above (<i>see</i> ¶ 51), the Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda.</p> <p>69. As described above (<i>see</i> ¶ 52), and on information and belief, the infringing Lyft apparatus further comprises a data lake on the Amazon Simple Storage Service (Amazon S3), which leverages Amazon Redshift to analyze the vast amount of data Lyft stores on the Cloud. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services data centers located across the United States.</p>	Lyft

	<p>70. As described above (<i>see</i> ¶ 53), and on information and belief, the infringing Lyft apparatus maintains and stores in memory realtime data with respect to the location of available (and soon-to-be available) Independent Contractors (<i>i.e.</i>, the drivers); the data includes at least information concerning the vehicle and present occupancy/capacity. On information and belief, the Lyft apparatus further maintains and stores in memory real-time data concerning the location and needs of the hiring entity or employer (<i>i.e.</i>, the rider). On information and belief, the infringing Lyft apparatus further filters all Independent Contractors by their respective GPS locations and capacities relative to the needs and location of the hiring entity (rider) in real-time; riders are then related to the most appropriate Independent Contractors. On information and belief, this “pairing” process is further informed by the estimated arrival time of the driver, as well as the mutual driver and rider preferences.</p> <p>71. As described above (<i>see</i> ¶ 54), and on information and belief, the infringing Lyft apparatus processes the relevant information as noted above in order to approximate arrival times, and delivers job notifications out to the Independent Contractors in order of priority until the opportunity is accepted. Drivers are able to perform job search queries by going into “Driver Mode” to “Go Online” as an available contractor for hire.</p> <p>72. As described above (<i>see</i> ¶ 55), and on information and belief, the infringing Lyft apparatus comprises a multitude of databases to store the pertinent data, all of which are based on the Amazon Web Services Platform. On information and belief, the Lyft Accused Instrumentalities comprise multiple data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are located Worldwide.</p>	
<p>a memory device, wherein the memory device stores information regarding an individual available for at least one of</p>	<p><u>Paragraphs 73 of the First Amended First Amended Complaint</u></p> <p>73. As described above (<i>see</i> ¶ 56), and on information and belief, the Lyft Accused Instrumentalities comprise a memory device, which stores information regarding individuals available for applying for a job opportunity or hiring need. More specifically, and on information and belief, the Lyft memory device stores</p>	<p>Lyft Driver (Lyft Mobile Application for Drivers)</p>

applying for and interviewing for at least one of a job, a job opportunity, and a hiring need,	information concerning drivers who are available and willing to accept assignments within the Lyft network. The Lyft Accused Instrumentalities store work schedule information for each such driver (independent contractor) by virtue of the driver's "Online" availability, which is indicated via the Lyft Driver Mobile Application and stored in the Lyft memory devices. Each such driver, on information and belief, is employed by Lyft as an Independent Contractor and is retained by users of the Lyft apparatus to perform specific, defined tasks for the benefit of the user.	
and further wherein the memory device stores information regarding a recruitment search request or inquiry	<p><u>Paragraph 74 of the First Amended First Amended Complaint</u></p> <p>74. As described above (<i>see</i> ¶ 57), and on information and belief, the Lyft Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Lyft apparatus completes a Ride Request. Each such Request comprises a job posting for Lyft drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. On information and belief, information regarding such search requests are stored in the Lyft memory devices. On information and belief, the Lyft processing device utilizes the information regarding an individual (i.e., the Lyft drivers) stored in the memory device in processing the information regarding a recruitment search request or inquiry (<i>see, e.g.,</i> ¶¶ 53-54).</p>	Lyft
a processing device, wherein the processing device processes the information regarding a recruitment search request or inquiry upon a detection of an occurrence of a searching event,	<p><u>Paragraph 74 of the First Amended First Amended Complaint</u></p> <p>74. As described above (<i>see</i> ¶ 57), and on information and belief, the Lyft Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Lyft apparatus completes a Ride Request. Each such Request comprises a job posting for Lyft drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. On information and belief, information regarding such search requests are stored in the Lyft memory devices. On information and belief, the Lyft processing device utilizes the information regarding an individual (i.e., the Lyft drivers) stored in the memory</p>	Lyft

	device in processing the information regarding a recruitment search request or inquiry (<i>see, e.g., ¶¶ 53-54</i>).	
wherein the searching event is an occurrence of at least one of a job posting by at least one employer or at least one hiring entity, a posting of new or revised data or information from at least one individual or a group of individuals, a news release of a business event, an employment-related event, an economic report, industry-specific news, an event which creates an interest by at least one employer or at least one hiring entity to fill a position, and an event which creates an interest by at least one individual to seek a position,	<p><u>Paragraph 74 of the First Amended First Amended Complaint</u></p> <p>74. As described above (<i>see ¶ 57</i>), and on information and belief, the Lyft Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Lyft apparatus completes a Ride Request. Each such Request comprises a job posting for Lyft drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. On information and belief, information regarding such search requests are stored in the Lyft memory devices. On information and belief, the Lyft processing device utilizes the information regarding an individual (i.e., the Lyft drivers) stored in the memory device in processing the information regarding a recruitment search request or inquiry (<i>see, e.g., ¶¶ 53-54</i>).</p>	Lyft
wherein the processing device automatically detects the occurrence of the searching event,	<p><u>Paragraph 74 of the First Amended First Amended Complaint</u></p> <p>74. As described above (<i>see ¶ 57</i>), and on information and belief, the Lyft Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Lyft apparatus</p>	Lyft

	<p>completes a Ride Request. Each such Request comprises a job posting for Lyft drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. On information and belief, information regarding such search requests are stored in the Lyft memory devices. On information and belief, the Lyft processing device utilizes the information regarding an individual (i.e., the Lyft drivers) stored in the memory device in processing the information regarding a recruitment search request or inquiry (<i>see, e.g.,</i> ¶¶ 53-54).</p>	
<p>wherein the processing device utilizes the information regarding an individual stored in the memory device in processing the information regarding a recruitment search request or inquiry,</p>	<p><u>Paragraph 74 of the First Amended First Amended Complaint</u></p> <p>74. As described above (<i>see</i> ¶ 57), and on information and belief, the Lyft Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Lyft apparatus completes a Ride Request. Each such Request comprises a job posting for Lyft drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. On information and belief, information regarding such search requests are stored in the Lyft memory devices. On information and belief, the Lyft processing device utilizes the information regarding an individual (i.e., the Lyft drivers) stored in the memory device in processing the information regarding a recruitment search request or inquiry (<i>see, e.g.,</i> ¶¶ 53-54).</p>	Lyft
<p>and further wherein the processing device generates a message containing information regarding the individual,</p>	<p><u>Paragraph 75 of the First Amended First Amended Complaint:</u></p> <p>75. The Lyft Accused Instrumentalities comprise a processing device which generates a message containing information regarding the individual (including but not limited to, availability, proximity, acceptance, identity, photo, estimated time of arrival, and location). The message is responsive to the recruitment search request. The message is transmitted to the user (employer or hiring entity) via the Lyft Mobile Application or via the Lyft website. <i>See</i> ¶ 57; <i>see also</i> Fig. 3:</p>	Lyft

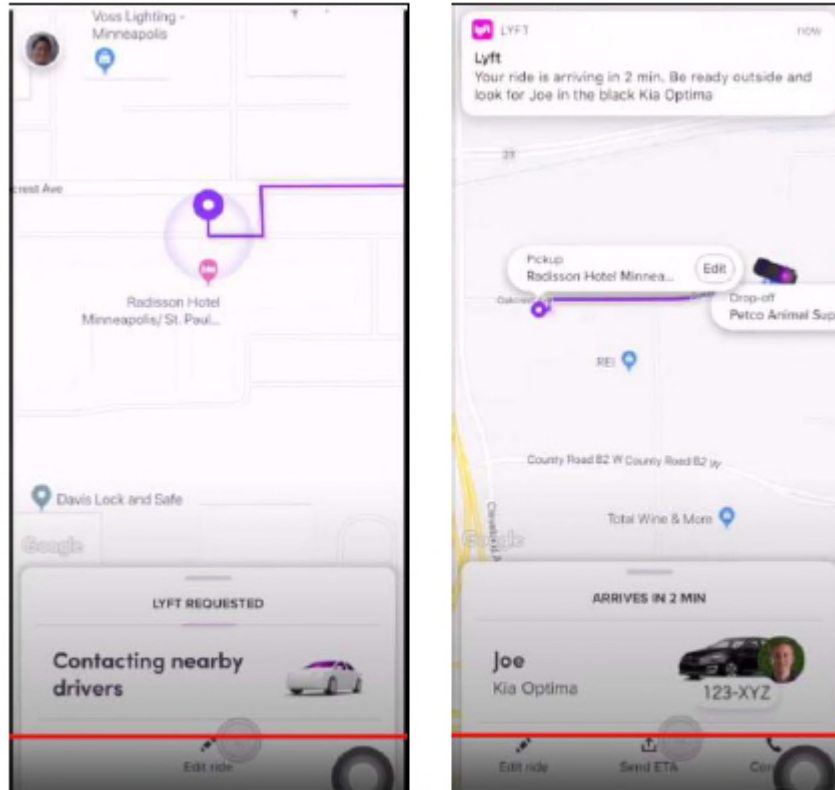


FIGURE 3

See Lyft Passenger Tutorial, available at:
<https://www.youtube.com/watch?v=j0RDMLcmOgU>.

wherein the message is responsive to the recruitment search request or inquiry; and

Paragraph 75 of the First Amended First Amended Complaint:

75. The Lyft Accused Instrumentalities comprise a processing device which generates a message containing information regarding the individual (including but not limited to, availability, proximity, acceptance, identity, photo, estimated time of arrival, and location). The message is responsive to the recruitment search request. The message is transmitted to the user

None

(employer or hiring entity) via the Lyft Mobile Application or via the Lyft website. *See* ¶ 57; *see also* Fig. 3:

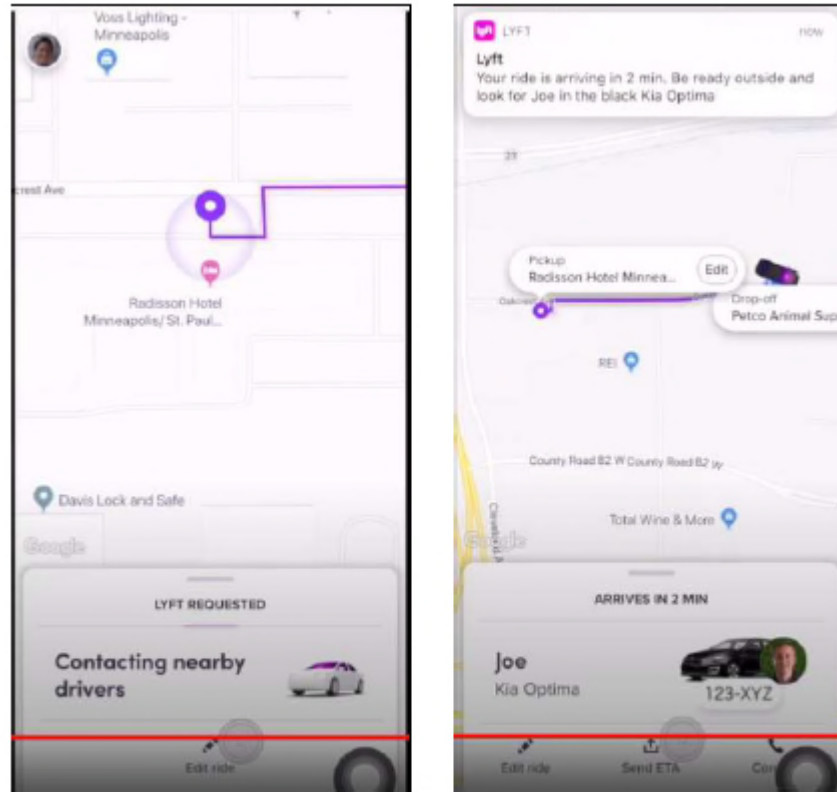


FIGURE 3

See Lyft Passenger Tutorial, available at:
<https://www.youtube.com/watch?v=j0RDMcmOgU>.

a transmitter,

Paragraph 68, 72 of the First Amended First Amended Complaint:

68. As described above (*see* ¶ 51), the Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and

Lyft

	<p>services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda. <i>See</i> above.</p> <p>72. As described above (see ¶ 55), and on information and belief, the infringing Lyft apparatus comprises a multitude of databases to store the pertinent data, all of which are based on the Amazon Web Services Platform. On information and belief, the Lyft Accused Instrumentalities comprise multiple data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are located Worldwide.</p>	
<p>wherein the transmitter transmits the message to a communication device associated with an employer or hiring entity.</p>	<p><u>Paragraph 75 of the First Amended Complaint:</u></p> <p>75. The Lyft Accused Instrumentalities comprise a processing device which generates a message containing information regarding the individual (including but not limited to, availability, proximity, acceptance, identity, photo, estimated time of arrival, and location). The message is responsive to the recruitment search request. The message is transmitted to the user (employer or hiring entity) via the Lyft Mobile Application or via the Lyft website. See ¶ 57; see also Fig. 3:</p>	Lyft

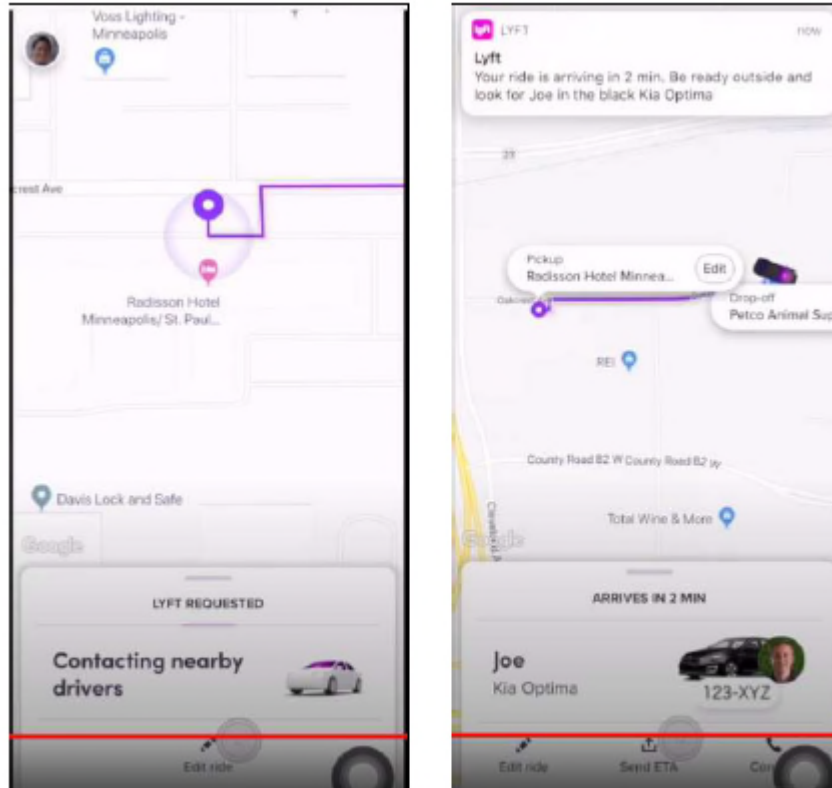


FIGURE 3

See Lyft Passenger Tutorial, available at:
<https://www.youtube.com/watch?v=j0RDMLcmOgU>.